

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

v.

FREDERIC Z. KONIGSBERG, SUSAN M.
KONIGSBERG, BRADERMAK, LTD.,
BRADERMAK EQUITIES CORP., LEE
RAUTENBERG, JAN STAHL, GERI STAHL,
H. PETER STEIL, APO HEALTH, INC. PSP
F/B/O H. PETER STEIL, APO HEALTH, INC.
PSP F/B/O JAN STAHL, BUYER'S
ALTERNATIVES, INC. PSP F/B/O JAN
STAHL, and PJS TRADING, INC. PSP F/B/O
JAN STAHL

Defendants.

Adv. Pro. No. 10-04394 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted
pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including May 3, 2021.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: February 1, 2021
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Robertson D. Beckerlegge
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Robertson D. Beckerlegge
Email: rbeckerlegge@bakerlaw.com
Robyn M. Feldstein
Email: rfeldstein@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Liquidation of Bernard L. Madoff Investment
Securities LLC and the estate of Bernard L. Madoff*

BERNFELD, DEMATTEO & BERNFELD LLP

By: /s/ David Bernfeld
600 Third Avenue
New York, New York 10016
Telephone: 212.661.1661
Facsimile: 212.557.9610
David B. Bernfeld
Email: davidbernfeld@bernfeld-dematteo.com
Jeffrey L. Bernfeld
Email: jeffreybernfeld@bernfeld-dematteo.com

*Attorneys for Defendants Frederic Z. Konigsberg,
Susan M. Konigsberg, Bradermak, Ltd., Bradermak
Equities Corp., Lee Rautenberg*

/s/ Deborah A. Reperowitz
Deborah A. Reperowitz, Mediator